

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) v. CRIMINAL NO.: 23-CR-10202-FDS
)
LINDSAY GROVES)

DEFENDANT’S MOTION TO ENLARGE TIME TO FILE MOTION TO SUPPRESS

Now comes the Defendant, Lindsay Groves, by her attorney, and hereby moves that this Honorable Court enlarge the time by which she must file a motion to suppress.

In support of this request, the defendant shares the following:

1. The Court issued its Order finding Ms. Groves competent to stand trial on August 12, 2025. Undersigned counsel was on vacation and did not return until September 5, 2025.
2. Ms. Groves’ other attorneys were working during that time period to evaluate any potential motions to suppress and trial issues. Further, the parties are well underway towards plea discussions.
3. If the Defendant does not choose to plead, and litigates the motion to suppress, it is likely that a new evaluation of her will be necessary as the previous experts did not administer two relevant tests – Miranda Rights Comprehension Instrument (MRCI) and the Standardized Assessment of Miranda Abilities (SAMA). In order to properly prepare a motion to suppress her statements, the Defendant needs to hire an expert to perform both of these tests, provide their results to support the motion, and potentially testify at the hearing. Defense Counsel has conferred with 3 different experts thus far,

one of whom is available to perform the tests and work with counsel, but not on the timetable that is presently set by the Court.

4. The Defendant expects that the Government will propose a resolution on this case that would make any filing of a motion to suppress moot, however, that formal proposal has not yet been received or communicated to the Defendant.

The Defendant requests that we discuss the timing of the motion to suppress at the status conference set for September 25, 2025. The parties have conferred and the Government opposes the request to enlarge the time to file the motion.

LINDSAY GROVES
By her Attorney
/s/ Jessica P. Thrall
Jessica P. Thrall,
B.B.O. 670412
Assistant Federal Public Defender
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
617- 223- 8061

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on September 24, 2025.

/s/ Jessica Thrall
Jessica Thrall